

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

TIMOTHY J. DONOHUE,	)	Case No. 4:22-CV-4044-LLP
	)	
Plaintiff,	)	
	)	
v.	)	
	)	PLAINTIFF'S MOTION
ARTHUR J. GALLAGHER & CO., a	)	FOR PERMISSION TO
Delaware corporation; and BOB	)	FILE SURREPLY BRIEF
JACOBSEN,	)	
	)	
Defendants.	)	

Plaintiff, by his counsel of record, respectfully moves the Court for an Order permitting the filing and service of Plaintiff's Surreply Brief in the form submitted herewith, both in support of Plaintiff's Motion for Partial Summary Judgment and in opposition to Defendants' Motion for Partial Summary Judgment. The necessity of the Surreply Brief is created by the Defendants' inaccurate and misleading quotation of SDCL 22-11-19, as explained in the accompanying Surreply Brief.

Dated: August 22, 2022

CADWELL SANFORD DEIBERT  
& GARRY LLP

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